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May 6, 2024

VIA ECF

Hon. Rukhsanah L. Singh, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: M. Cohen and Sons, Inc. v. Platte River Ins. Co., et al.
Docket No.: 3:20-cv-02149

Dear Judge Singh:

This firm represents Plaintiff M. Cohen and Sons, Inc. and Counterclaim Defendants (collectively, "MCS") in the above-referenced matter. We write jointly on behalf of MCS and non-party McLaren Engineering Group ("McLaren") with respect to the April 5, 2024 Motion to Compel Compliance with a Subpoena directed to non-party McLaren Engineering Group (ECF 299). That motion is returnable today, May 6, 2024. We write to provide a joint status update and to request that the Court take no action with respect to the motion while counsel for MCS and McLaren work to resolve the issues presented in the pending Motion.

Since the motion was filed, McLaren recently retained new counsel, who contacted us on Monday, April 29, 2024, confirming that McLaren would produce documents in response to the subpoena, and that the documents would be produced by Wednesday, May 1, 2024. McLaren maintains that it complied with the Subpoena by producing a written response to the Subpoena and documents on May 2, 2024.

Counsel for both parties have discussed the Motion and McLaren's responses to the Subpoena. MCS is currently reviewing the production and seeks certain clarifications with respect to McLaren's document production, which McLaren's Counsel is addressing.

Because we are engaged in the meet and confer process with McLaren's counsel with the goal of resolving the issues presented in the pending motion, we respectfully request that the Court holds

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the motion and takes no action with respect to it. To the extent that our discussions resolve these issues, we will notify the Court without delay.

We thank Your Honor for consideration to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Dominique J. Carroll".

Dominique J. Carroll

cc: All counsel of record (via ECF)

David B. Kosakoff, Esq. (via e-mail)